

EXHIBIT 5

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18 REED, and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,
27

28 Plaintiffs.

CASE NO. 2:16-cv-02129-SJO (RAOx)
**PLAINTIFFS' SUPPLEMENTAL
DISCLOSURES**

1
2 v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
6 not limited to SANG LEE, BRANT
7 BLAKEMAN, ALAN JOHNSTON
8 AKA JALIAN JOHNSTON,
9 MICHAEL RAE PAPAYANS,
10 ANGELO FERRARA, FRANK
11 FERRARA, CHARLIE FERRARA,
12 and N.F.; CITY OF PALOS
13 VERDES ESTATES; CHIEF OF
14 POLICE JEFF KEPLEY, in his
15 representative capacity; and DOES
16 1-10,

17 Defendants.

18 Plaintiffs CORY SPENCER, DIANA MILENA REED, and COASTAL
19 PROTECTION RANGERS, INC. (collectively, "Plaintiffs") make the following
20 supplemental initial disclosures pursuant to F.R.C.P. 26(a)(1). As permitted
21 under Rule 26(e)(1), Plaintiffs reserve the right to clarify, amend, modify or
22 further supplement the information contained in these Supplemental
23 Disclosures if they obtain additional supplemental information. In addition,
24 Plaintiffs may rely on any persons or documents identified by any party as
25 part of their disclosures or during discovery.

26 Plaintiffs' Supplemental Disclosures are made without waiver of, or
27 prejudice to, any objections Plaintiffs may assert or have previously
28 asserted. Plaintiffs expressly reserve all objections, including, but not limited
to: (a) attorney-client privilege; (b) work-product doctrine; and (c) any other
applicable privilege or protection under federal or state law. Plaintiffs
reserve the right to retract any inadvertent disclosures of information or

documents that are protected by the attorney-client privilege, the work product doctrine, or any other applicable protection.

Without waiving any objections, Plaintiffs make the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

A. Witnesses

Plaintiffs are in the process of identifying witnesses who are likely to have discoverable information. However, at this early stage, Plaintiffs identify the following person(s) they may use to support their claims:

- 1) Plaintiff class representative, Cory Spencer, who may be reached via counsel for Plaintiffs, on the subjects set forth in the Complaint, to which he was a percipient witness.
- 2) Plaintiff class representative, Diana Milena Reed, who may be reached via counsel for Plaintiffs, on the subjects set forth in the Complaint, to which she was a percipient witness.
- 3) Defendant, Sang Lee, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and the Individual Members of the Lunada Bay Boys.
- 4) Defendant, Brant Blakeman, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and the Individual Members of the Lunada Bay Boys.
- 5) Defendant, Michael Rae Papayans, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and the Individual Members of the Lunada Bay Boys.
- 6) Defendant, Angelo Ferrara, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and the Individual Members of the Lunada Bay Boys.

- 1 7) Defendant, Charlie Ferrara, on the allegations set forth in the
- 2 Complaint related to Defendant Lunada Bay Boys and
- 3 Individual Members of the Lunada Bay Boys.
- 4 8) Defendant, N.F., on the allegations set forth in the Complaint
- 5 related to Defendant Lunada Bay Boys and Individual
- 6 Members of the Lunada Bay Boys.
- 7 9) Defendant Frank Ferrara, on the allegations set forth in the
- 8 Complaint related to Defendant Lunada Bay Boys and
- 9 Individual Members of the Lunada Bay Boys.
- 10 10) Defendant, Chief of Police, Jeff Kepley, on the allegations set
- 11 forth in the Complaint related to Defendant City of Palos
- 12 Verdes Estates, Defendant Lunada Bay Boys and Individual
- 13 Members of the Lunada Bay Boys.
- 14 11) David Melo. Defendant in the state court action, Los Angeles
- 15 Superior Court Case No. BC629596, David Melo, on the
- 16 allegations set forth in the Complaint related to Defendant
- 17 Lunada Bay Boys and Individual Members of the Lunada Bay
- 18 Boys.
- 19 12) Mark Griep. Defendant in the state court action, Los Angeles
- 20 Superior Court Case No. BC629596, Mark Griep, on the
- 21 allegations set forth in the Complaint related to Defendant
- 22 Lunada Bay Boys and Individual Members of the Lunada Bay
- 23 Boys.
- 24 13) Tim Browne, address unknown, on the allegations set forth in
- 25 the Complaint related to Defendant City of Palos Verdes
- 26 Estates, Defendant Lunada Bay Boys and Individual
- 27 Members of the Lunada Bay Boys.
- 28 14) Joe Bark. Full address unknown; (310) 429-2463,

1 Joe@joebark.com on the allegations set forth in the
2 Complaint related to Defendant Lunada Bay Boys and the
3 Individual Members of the Lunada Bay Boys. Plaintiffs are
4 informed and believe that Mr. Bark is a long time Lunada Bay
5 Local and serves in a leadership capacity of the Bay Boys.
6 Plaintiffs are further informed and believe that: 1) Mr. Bark
7 has been involved in forming policy and strategy to keep
8 Lunada Bay localized, 2) Mr. Bark is included in key email
9 communications between Defendant Sang Lee and others
10 that describe Bay Boy tactics to keep outsiders and non-
11 locals from surfing Lunada Bay including emails dated
12 1/7/2011,1/8/2011,1/17/2011, 3) Mr. Bark has held meetings
13 to discuss strategy to keep Lunada Bay localized, 4) Mr. Bark
14 has knowledge of the inner workings of the Lunada Bay Boys
15 and the methods used to keep non-locals from the beach, 5)
16 Mr. Bark has knowledge of the illegal activities at Lunada Bay.
17 Mr. Bark is being listed as a potential percipient witness and
18 possible defendant.

- 19 15) Zen Del Rio, contact information unknown, on the allegations
20 set forth in the Complaint related to Defendant Lunada Bay
21 Boys and the Individual Members of the Lunada Bay Boys.
22 Plaintiffs are informed and believe that Mr. Del Rio is a long
23 time Lunada Bay Local and serves in a leadership capacity of
24 the Bay Boys. Plaintiffs are further informed and believe that:
25 1) Mr. Del Rio has been involved in forming policy and
26 strategy to keep Lunada Bay localized, 2) Mr. Del Rio is
27 included in key email communications from Defendant Sang
28 Lee that describe Bay Boy tactics to keep outsiders and non-

1 locals from surfing Lunada Bay including an email dated
2 1/16/2014 where the Bay Boys conspired to harass, intimidate
3 and disrupt MLK 2014 Lunada Bay Celebration, 3) Mr. Del
4 Rio has knowledge of the inner workings of the Lunada Bay
5 Boys and the methods to keep non-locals from the beach, 4)
6 Mr. Bark has knowledge of the illegal activities at Lunada Bay.
7 Mr. Del Rio is being listed as a potential percipient witness
8 and possible defendant.

9 16) John Camplin. Contact information believed to be: 2504 Via
10 Campesnia, Palos Verdes Estates, CA 90274 (714) 240-
11 5102, jc2332@aol.com. Plaintiffs are informed and believed
12 that Mr. Camplin is a longtime resident of Palos Verdes
13 Estates, who plaintiffs expect can offer testimony on the
14 allegations on the allegations set forth in the Complaint
15 related to Defendant Lunada Bay Boys and the Individual
16 Members of the Lunada Bay Boys including the following: 1)
17 Mr. Camplin is included in key email communications from
18 Defendant Sang Lee and other Lunada Bay locals that
19 describe Bay Boy tactics to keep outsiders and non-locals
20 from surfing Lunada Bay. Defendant Lee credits Mr. Camplin
21 and those of his generation with making up the rules of
22 engagement that govern the Bay Boys; 2) Danny Day
23 Celebrations; 3) the inner workings of the Lunada Bay Boys
24 and the methods to keep non-locals from the beach, and has
25 knowledge of the illegal activities at Lunada Bay. Mr. Camplin
26 is being listed as a potential percipient witness and possible
27 defendant.

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17) Charles Thomas Mowat aka "Chach." Contact info believed to be: 2337 Via Rivera, Palos Verdes Peninsula, CA 90274; (310) 375-6600, cmowat@gmail.com. Chach is a longtime resident of Palos Verdes Estates, who plaintiffs expect can offer testimony on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys, the Individual Members of the Lunada Bay Boys and communications with Defendant City of Palos Verdes Estates. Plaintiffs are informed and believe that Mr. Mowat holds a high leadership role in the Lunada Bay Boys and is a shot caller and expect that he can offer testimony about the following: 1) emails dated January 16 and 17, 2014 that he sent to Defendant Sang Lee and other Lunada Bay locals regarding plans to harass Chris Taloa and visiting surfers at the MLK event in 2014, 2) a 2/5/2016 February 5, 2016 text message plaintiffs are informed and believe that Mr. Mowatt sent to Defendant Brant Blakeman, Tom Sullivan, David Yoakley, Andy Patch, Defendant Michael Papayans and several others that said "There are 5 kooks standing on the bluff taking pictures...I think that same Taloa guy. Things could get ugly." A Los Angeles Times photographer captured a pictured of Defendant Blakeman of the bluff filming plaintiffs on the bluff, 3) an 2/5/2016 email Mr. Mowat sent to City Manager and other City official complaining about Chief Kepley's attempts to stop localism at Lunada Bay, 4) a text message that Mr. Mowat sent on 3/29/2016, to Defendant Alan Johnston aka Jalian Johnston, Michael Thiel, David Hilton and eight other people which states: "My source tells me that a class action

lawsuit is in the works against the 'bay boys' and the city of PVE. Probably that Diana bitch. Watch out for subpoenas. Great time to be on the ultra-down-low;" Plaintiffs are informed and believe that Mr. Mowat has been involved in forming policy and strategy to keep Lunada Bay localized, has knowledge of the inner workings of the Lunada Bay Boys and the methods to keep non-locals from the beach, and has knowledge of the illegal activities at Lunada Bay. Mr. Mowat is being listed as a potential percipient witness and possible defendant.

18) Michael S. Papayans, aka "Paps." Contact info believed to be: 1528 Paseo Del Mar, Palos Verdes Peninsula, CA 90274, (310) 373-7978, michaelpapayans@bellsouth.net. Paps is a longtime resident of Palos Verdes Estates who plaintiffs expect can offer testimony on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys, the Individual Members of the Lunada Bay Boys and communications with Defendant City of Palos Verdes Estates. Plaintiffs are informed and believe that he is the uncle of Defendant Michael Rae Papayans. Plaintiffs are informed and believe that Mr. Mowat holds a high leadership role in the Lunada Bay Boys and is a shot caller and expect that he can offer testimony about the following: This witness surfs Lunada Bay on a regular basis. It is anticipated that this witness has information regarding: 1) a meeting at his house in the mid-1990s after a surfing related incident that was grabbing the media attention. Peter McCollum and several other Lunada Bay Boys were captured on film assaulting Geoff Hagins by a

1 Ch 13 News Crew. There were several core Lunada Bay
2 locals at Paps house including Bill Kaemerle, Charlie Mowatt
3 and others. The locals were discussing how to keep people
4 away from Lunada Bay. Paps said they had first amendment
5 rights to say things like: "It's dangerous out there". "You are
6 going to get hurt." The intention was to act aggressively
7 towards outsiders at Lunada Bay, as a way to get them to
8 leave and discourage them from returning, 2) a protest
9 arranged by Mr. Hagins where Paps was filmed grabbing a
10 news camera and telling the media to leave, 3) a meeting that
11 he had with Chris Taloa in 2014 arranged by a mutual friend
12 whereby Taloa was seeking his permission to surf Lunada
13 Bay, 4) the inner workings of the Lunada Bay Boys and the
14 methods to keep non-locals from the beach, 5) illegal
15 activities at Lunada Bay, 6) Plaintiffs believe that Mr.
16 Papayans is a Lunada Bay Local and is being listed as a
17 potential percipient witness and possible defendant.

- 18 19) Steve Fairbrother. Contact info believed to be:
19 ssfairbro@gmail.com on the allegations set forth in the
20 Complaint related to Defendant Lunada Bay Boys and
21 Individual Members of the Lunada Bay Boys. Mr. Fairbrother
22 surfs and hangs out at Lunada Bay on a regular basis.
23 Plaintiffs are informed and believe that Mr. Fairbrother holds a
24 high leadership role in the Lunada Bay Boys and is a shot
25 caller and expect that he can offer testimony about the
26 following: Mr. Fairbrother is included in key email
27 communications from Mowat and others including a January
28 16, 2014 email circulated regarding plans to harass Chris

1 Taloa and visiting surfers at the MLK event in 2014. It is
2 anticipated that this witness has information regarding: 1) the
3 inner workings of the Lunada Bay Boys and the methods to
4 keep non-locals from the beach, 2) illegal activities at Lunada
5 Bay. Mr. Fairbrother is a Lunada Bay Local and is being listed
6 as a potential percipient witness and possible defendant.

7 20) Eric Binz. Contact information believed to be:
8 ericbinz@cox.net, on the allegations set forth in the Complaint
9 related to Defendant Lunada Bay Boys and Individual
10 Members of the Lunada Bay Boys. Plaintiffs are informed and
11 believe that Binz is a former resident of Palos Verdes Estates
12 that maintains strong ties to the community and a local surfer
13 at Lunada Bay. Binz surfs and hangs out at Lunada Bay on a
14 regular basis. A close trusted friend to Michael S. Papayans.
15 Plaintiffs are informed and believe a former enforcer. Binz is
16 included in key email communications from Defendant Sang
17 Lee that describe Bay Boy tactics to keep outsiders and non-
18 locals from surfing Lunada Bay. It is anticipated that this
19 witness has information regarding: 1) the inner workings of
20 the Lunada Bay Boys and the methods to keep non-locals
21 from the beach, 2) illegal activities at Lunada Bay. Binz is a
22 Lunada Bay Local and is being listed as a potential percipient
23 witness and possible defendant.

24 21) Caldwell Stephen Lewis aka "Reno." Contact info believed to
25 be: 629 S. Catalina Ave, Redondo Beach 90277, 310-316-
26 1104, renocaldwell@yahoo.com, on the allegations set forth
27 in the Complaint related to Defendant Lunada Bay Boys and
28 Individual Members of the Lunada Bay Boys. Plaintiffs are

1 informed and believe that Reno is a former resident of Palos
2 Verdes Estates that maintains strong ties to the community
3 and a local surfer at Lunada Bay. Reno surfs and hangs out
4 at Lunada Bay on a regular basis. Reno is included in key
5 email communications from Defendant Sang Lee that
6 describe Bay Boy tactics to keep outsiders and non-locals
7 from surfing Lunada Bay. Plaintiffs are informed believe that
8 Reno covers his face to conceal his identity when surfing
9 Lunada Bay. It is anticipated that this witness has information
10 regarding: 1) the inner workings of the Lunada Bay Boys and
11 the methods to keep non-locals from the beach, 2) illegal
12 activities at Lunada Bay. Caldwell is a Lunada Bay Local and
13 is being listed as a potential percipient witness and possible
14 defendant.

15 22) Thomas J. Sullivan Jr. Contact info believed to be: 617
16 Paseo Lunado, Palos Verdes Estates, CA 90274, (310) 947-
17 0087, sully@fire-usa.com, on the allegations set forth in the
18 Complaint related to Defendant Lunada Bay Boys and
19 Individual Members of the Lunada Bay Boys. Mr. Sullivan
20 surfs and hangs out at Lunada Bay on a regular basis.
21 Plaintiffs' believe that Sullivan has a role in the Lunada Bay
22 Boys an enforcer and expect that he can offer testimony
23 about the following: 1) Mr. Sullivan is included and/or
24 forwarding email communications encouraging Bay Boys to
25 harass non-local surfers. Plaintiffs are informed and believed
26 that he is the person referenced in police report DR-031009. It
27 is anticipated that this witness has information regarding: 2)
28 Mr. Sullivan is included in communications with other

1 enforcers such as Defendant Alan Johnston; 2) the inner
2 workings of the Lunada Bay Boys and the methods to keep
3 non-locals from the beach, 3) illegal activities at Lunada Bay.
4 Mr. Sullivan is a Lunada Bay Local and is being listed as a
5 potential percipient witness and possible defendant.

6 23) Andrew William Patch. Contact info believed to be: (310) 213-
7 1505, patchman@socal.rr.com, on the allegations set forth in
8 the Complaint related to Defendant Lunada Bay Boys and
9 Individual Members of the Lunada Bay Boys. Mr. Patch surfs
10 and hangs out at Lunada Bay on a regular basis. Mr. Patch is
11 one of the people that used to hang out at the patio structure
12 where illegal activities often took place. Mr. Patch is included
13 in key email communications from Mowat and others including
14 a January 16, 2014 email circulated regarding plans to harass
15 Chris Taloa and visiting surfers at the MLK event in 2014. It is
16 anticipated that this witness has information regarding: 1) the
17 inner workings of the Lunada Bay Boys and the methods to
18 keep non-locals from the beach, 2) illegal activities at Lunada
19 Bay. Mr. Babros is a Lunada Bay Local and is being listed as
20 a potential percipient witness and possible defendant.

21 24) Geoff D'Sena. Contact information believed to be:
22 geoff.dsena@turelk.com, on the allegations set forth in the
23 Complaint related to Defendant Lunada Bay Boys and
24 Individual Members of the Lunada Bay Boys. Mr. Desena is
25 included in key email communications from Mowat and others
26 including a January 16, 2014 email circulated regarding plans
27 to harass Chris Taloa and visiting surfers at the MLK event in
28 2014. It is anticipated that this witness has information

1 regarding: 1) the inner workings of the Lunada Bay Boys and
2 the methods to keep non-locals from the beach, 2) illegal
3 activities at Lunada Bay. Mr. Desena is a Lunada Bay Local
4 and is being listed as a potential percipient witness and
5 possible defendant.

6 25) Brandon Sean Vandine aka "Cobber." Contact info believed to
7 be: 2132 Paseo Del Mar, Palos Verdes Estates, CA 90274,
8 on the allegations set forth in the Complaint related to
9 Defendant Lunada Bay Boys and Individual Members of the
10 Lunada Bay Boys. Mr. Vandine surfs and hangs out at
11 Lunada Bay on a regular basis. Mr. Vandine is one of the
12 people that used to hang out at the patio structure where
13 illegal activities often took place. Plaintiffs' believe that
14 Vandine has a role in the Lunada Bay Boys an enforcer and
15 expect that he can offer testimony about the following: 1) an
16 incident that occurred on October 10, 2015 which is
17 documented in Officer Report for Incident 15-12058 where he
18 attacked Jason Buck; 2) the inner workings of the Lunada Bay
19 Boys and the methods to keep non-locals from the beach, 3)
20 illegal activities at Lunada Bay. Vandine is a Lunada Bay
21 Local and is being listed as a potential percipient witness and
22 possible defendant.

23 26) Peter Babros. Contact info believed to be: 316 Via Pasqual,
24 Redondo Beach, CA 90277, (310) 292-1179,
25 peterb@remed.com, on the allegations set forth in the
26 Complaint related to Defendant Lunada Bay Boys and
27 Individual Members of the Lunada Bay Boys. Plaintiffs are
28 informed and believe that Mr. Babros is a former resident of

1 the City of Palos Verdes Estates having graduated PV High
2 School in 1988 and maintains strong connections to the
3 community. Mr. Babros surfs and hangs out at Lunada Bay on
4 a regular basis. Mr. Babros is included in key email
5 communications from Defendant Sang Lee that describe Bay
6 Boy tactics to keep outsiders and non-locals from surfing
7 Lunada Bay. It is anticipated that this witness has information
8 regarding: 1) the inner workings of the Lunada Bay Boys and
9 the methods to keep non-locals from the beach, 2) illegal
10 activities at Lunada Bay. Mr. Babros is a Lunada Bay Local
11 and is being listed as a potential percipient witness and
12 possible defendant.

13 27) Brad Ring aka "Ringer." Contact information unknown. On
14 the allegations set forth in the Complaint related to Defendant
15 Lunada Bay Boys and Individual Members of the Lunada Bay
16 Boys. Plaintiffs are informed and believe that Ring is a former
17 resident of Palos Verdes Estates that maintains strong ties to
18 the community and a local surfer at Lunada Bay. Ring is
19 included in key email communications from Defendant Sang
20 Lee that describe Bay Boy tactics to keep outsiders and non-
21 locals from surfing Lunada Bay. It is anticipated that this
22 witness has information regarding: 1) the inner workings of
23 the Lunada Bay Boys and the methods to keep non-locals
24 from the beach, 2) illegal activities at Lunada Bay. Ring is a
25 Lunada Bay Local and is being listed as a potential percipient
26 witness and possible defendant.

27 28) Charley Beukema. Contact information unknown. On the
28 allegations set forth in the Complaint related to Defendant

1 Lunada Bay Boys and Individual Members of the Lunada Bay
2 Boys. Plaintiffs are informed and believe that Beukema is a
3 former resident of Palos Verdes Estates that maintains strong
4 ties to the community and a local surfer at Lunada Bay.
5 Beukema is included in key email communications from
6 Defendant Sang Lee that describe Bay Boy tactics to keep
7 outsiders and non-locals from surfing Lunada Bay. It is
8 anticipated that this witness has information regarding: 1) the
9 inner workings of the Lunada Bay Boys and the methods to
10 keep non-locals from the beach, 2) illegal activities at Lunada
11 Bay. Beukema is a Lunada Bay Local and is being listed as a
12 potential percipient witness and possible defendant.

13 29) David Yoakley. Contact info believed to be: 2850 Winlock Rd.,
14 Torrance, CA, 310-963-6889, on the allegations set forth in
15 the Complaint related to Defendant Lunada Bay Boys and
16 Individual Members of the Lunada Bay Boys. Plaintiffs are
17 informed and believe that Yoakley is a former resident of
18 Palos Verdes Estates that maintains strong ties to the
19 community and a local surfer at Lunada Bay. Yoakley is
20 included in key email communications from Defendant Sang
21 Lee that describe Bay Boy tactics to keep outsiders and non-
22 locals from surfing Lunada Bay. It is anticipated that this
23 witness has information regarding: 1) the inner workings of
24 the Lunada Bay Boys and the methods to keep non-locals
25 from the beach, 2) illegal activities at Lunada Bay. Yoakley is
26 a Lunada Bay Local and is being listed as a potential
27 percipient witness and possible defendant.

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- 1 30) Bill Kaemerle. Contact information unknown, on the
2 allegations set forth in the Complaint related to Defendant
3 City of Palos Verdes Estates, Defendant Lunada Bay Boys
4 and Individual Members of the Lunada Bay Boys. Mr.
5 Kaemerle surfs and hangs out at Lunada Bay on a regular
6 basis. Plaintiffs are informed and believe that Mr. Kaemerle
7 previously was one of the primary enforcers at Lunada Bay.
8 Defendant Angelo Ferraro testified at his deposition that Mr.
9 Kaemerle dressed in blakeface at the MLK 2014 celebration
10 at Lunada Bay. It is anticipated that this witness has
11 information regarding: (a) the inner workings of the Lunada
12 Bay Boys and the methods to keep non-locals from the
13 beach, and (b) illegal activities at Lunada Bay. Mr. Kaemerle
14 is a Lunada Bay Local and is being listed as a potential
15 percipient witness and possible defendant.
- 16 31) Eric Michael Lamers. Contact info believed to be: 2337 Palos
17 Verdes Drive West, 310-985-4999, on the allegations set forth
18 in the Complaint related to Defendant Lunada Bay Boys and
19 Individual Members of the Lunada Bay Boys. Mr. Lamers
20 surfs and hangs out at Lunada Bay on a regular basis. Mr.
21 Lamers is a Lunada Bay Local and is being listed as a
22 potential percipient witness and possible defendant.
- 23 32) Jason Stafford. Contact info believed to be: 717 Palos Verdes
24 Dr. West, Palos Verdes Estates, CA 90274, (310) 944-5005,
25 jason.stafford@cox.net, on the allegations set forth in the
26 Complaint related to Defendant Lunada Bay Boys and
27 Individual Members of the Lunada Bay Boys. It is anticipated
28 that this witness has information regarding: 1) the inner

1 workings of the Lunada Bay Boys and the methods to keep
2 non-locals from the beach, 2) illegal activities at Lunada Bay.
3 Stafford is a Lunada Bay Local and is being listed as a
4 potential percipient witness and possible defendant.

5 33) Zach Stafford. Contact info believed to be: 717 Palos Verdes
6 Dr. West, Palos Verdes Estates, CA 90274. Mr. Stafford surfs
7 and hangs out at Lunada Bay on a regular basis. Mr. Stafford
8 is included and/or forwarding email communications
9 encouraging Bay Boys to harass non-local surfers. Plaintiffs
10 and informed and believe that Mr. Stafford. Stafford is a
11 Lunada Bay Local and is being listed as a potential percipient
12 witness and possible defendant.

13 34) Evan Todd Levy. Contact info believed to be: 1077 W. 10th
14 Street, San Pedro, Ca. Mr. Levy surfs and hangs out at
15 Lunada Bay on a regular basis. It is anticipated that this
16 witness has information regarding: 1) the inner workings of
17 the Lunada Bay Boys and the methods to keep non-locals
18 from the beach, 2) illegal activities at Lunada Bay. Caldwell is
19 a Lunada Bay Local and is being listed as a potential
20 percipient witness and possible defendant.

21 35) Lewis Latimer, contact information unknown, on the
22 allegations set forth in the Complaint related to Defendant
23 Lunada Bay Boys and the Individual Members of the Lunada
24 Bay Boys. Plaintiffs are informed and believe that Mr. Latimer
25 has surfed Lunada Bay and witnessed Defendant Alan
26 Johnston harassing John MacHarg. Latimer is a Lunada Bay
27 Local and is being listed as a potential percipient witness and
28 possible defendant.

1 36) Alex Gray, contact information unknown, on the allegations
2 set forth in the Complaint related to Defendant Lunada Bay
3 Boys and the Individual Members of the Lunada Bay Boys.
4 Mr. Gray surfs and hangs out at Lunada Bay on a regular
5 basis. Plaintiffs are informed and believe that Mr. Gray can
6 testify regarding: 1) a conversation with Chris Taloa which
7 occurred on the North Shore of HI, 2) defendant Brant
8 Blakeman and other Lunada Bay Boys' methods to keep non-
9 locals from the beach, 3) the illegal conduct of defendant
10 Brant Blakeman and others at Lunada Bay. Mr. Gray's name
11 is being listed only as a potential percipient witness.

12 37) Robert Bacon, contact information unknown,
13 4bacons@cox.net, on the allegations set forth in the
14 Complaint related to Defendant Lunada Bay Boys and
15 Individual Members of the Lunada Bay Boys. Plaintiffs are
16 informed and believe that Mr. Bacon graduated PV High
17 School in 1978. Mr. Bacon surfs and hangs out at Lunada
18 Bay on a regular basis. Mr. Bacon is included in key email
19 communications from Defendant Sang Lee that describe Bay
20 Boy tactics to keep outsiders and non-locals from surfing
21 Lunada Bay. It is anticipated that this witness has information
22 regarding: 1) Josh Berstein harassing people visiting Lunada
23 Bay including an incident captured on video in 2016, 2) the
24 inner workings of the Lunada Bay Boys and the methods to
25 keep non-locals from the beach, 3) illegal activities at Lunada
26 Bay. Mr. Berstein is a Lunada Bay Local and is being listed as
27 a potential percipient witness and possible defendant.

28 38) Josh Berstein, (310) 351-8004, 2633 Palos Verdes Drive

1 West, Palos Verdes Estates, CA 90274., on the allegations
2 set forth in the Complaint related to Defendant Lunada Bay
3 Boys and Individual Members of the Lunada Bay Boys. Mr.
4 Berstain surfs and hangs out at Lunda Bay on a regular basis
5 and is often involved in the harassment of outsiders. It is
6 anticipated that Mr. Berstein will tesify regarding: 1) a
7 declaration he submitted to the California Coastal
8 Commission regarding trail access; 2) October 29, 2016
9 incident where he and Lunada Bay Local Robert Bacon
10 harassed Ken Claypool as he drove by; 3) numerous
11 incidents where he and Angelo Ferrara verbally harassed
12 visiting surfers; 4) The inner workings of the Lunada Bay Boys
13 and the methods used to keep non-locals from the beach; 5)
14 illegal activities at Lunada Bay. Mr. Berstein is being listed as
15 a potential percipient witness and possible defendant.

16 39) Beukema Cassidy Rose. Contact information believed to be:
17 2817 Palos Verdes Drive West, Palos Verdes Estates, CA,
18 90274, on the allegations set forth in the Complaint related to
19 Defendant Lunada Bay Boys and Individual Members of the
20 Lunada Bay Boys. Plaintiffs are informed and believe that Ms.
21 Beukema is the stepdaughter to Defendant Angelo Ferraro
22 and stepsister to defendant N.F. Plaintiffs anticipate that this
23 witness has information related to: 1) her involvement with
24 Devon Demaria in the harassment of visiting surfers, including
25 Ken Claypool and Chris Taloa, on MLK Day 2017 which was
26 caught on tape, 2) the inner workings of the Lunada Bay Boys
27 and the methods to keep non-locals from the beach, 3) illegal
28 activities at Lunada Bay including the selling of narcotics and

1 drugs, 4) Plaintiffs' believe that Ms. Beukema is a member of
2 the Lunada Bay Boys. Mr. Beukema is being listed as a
3 potential percipient witness and possible defendant.

4 40) Devon Demaria. Contact information believed to be: (310)
5 753-5658. Plaintiffs are informed and believe that Ms.
6 Demaris is dating Defendant Alan Johnston. Plaintiffs
7 anticipate that this witness has information related to: 1) her
8 involvement with Cassidy Beukema in the harassment of
9 visiting surfers, including Ken Claypool and Chris Taloa, on
10 MLK Day 2017 which was caught on tape, 2) the inner
11 workings of the Lunada Bay Boys and the methods to keep
12 non-locals from the beach, 3) illegal activities at Lunada Bay,
13 4) Plaintiffs' believe that Ms. Demaria is a member of the
14 Lunada Bay Boys. Ms. Demaria is being listed as a potential
15 percipient witness and possible defendant.

16 41) Eric Rigler. Contact info believed to be: on the allegations set
17 forth in the Complaint related to Defendant Lunada Bay Boys
18 and Individual Members of the Lunada Bay Boys. Mr. Rigler
19 surfs and hangs out at Lunada Bay on a regular basis. Mr.
20 Rigler is included in key email communications from
21 Defendant Sang Lee that describe Bay Boy tactics to keep
22 outsiders and non-locals from surfing Lunada Bay. Mr. Rigler
23 attended and was a key participant in many of the Danny Day
24 Celebrations. It is anticipated that this witness has information
25 regarding: 1) the inner workings of the Lunada Bay Boys and
26 the methods to keep non-locals from the beach, 2) illegal
27 activities at Lunada Bay. Mr. Rigler is a Lunada Bay Local
28 and is being listed as a potential percipient witness and

possible defendant.

42) Derek Debraal. derek.debraal@sbcglobal.net, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and Individual Members of the Lunada Bay Boys. Mr. Debraal is included in key email communications from Defendant Sang Lee that describe Bay Boy tactics to keep outsiders and non-locals from surfing Lunada Bay. It is anticipated that this witness has information regarding: 1) the inner workings of the Lunada Bay Boys and the methods to keep non-locals from the beach, 2) illegal activities at Lunada Bay. Mr. Debraal is a Lunada Bay Local and is being listed as a potential percipient witness and possible defendant.

43) Daryll Stolz. Contact information not known, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and Individual Members of the Lunada Bay Boys. Mr. Rigler surfs and hangs out at Lunada Bay on a regular basis. Mr. Stolz is included in key email communications from Defendant Sang Lee that describe Bay Boy tactics to keep outsiders and non-locals from surfing Lunada Bay. It is anticipated that this witness has information regarding: 1) the inner workings of the Lunada Bay Boys and the methods to keep non-locals from the beach, 2) illegal activities at Lunada Bay. Mr. Stolz is a Lunada Bay Local and is being listed as a potential percipient witness and possible defendant.

44) Jay Dutson. Contact info believed to be: jayduston@sbcglobal.net, on the allegations set forth in the Complaint related to Defendant Lunada Bay Boys and

1 Individual Members of the Lunada Bay Boys. Mr. Dutson is
2 included in key email communications from Defendant Sang
3 Lee that describe Bay Boy tactics to keep outsiders and non-
4 locals from surfing Lunada Bay. It is anticipated that this
5 witness has information regarding: 1) the inner workings of
6 the Lunada Bay Boys and the methods to keep non-locals
7 from the beach, 2) illegal activities at Lunada Bay. Mr. Rigler
8 is a Lunada Bay Local and is being listed as a potential
9 percipient witness and possible defendant.

10 45) Leo Ferrara, 2817 Palos Verdes Drive West, Palos Verdes
11 Estates, CA, on the allegations set forth in the Complaint
12 related to Defendant Lunada Bay Boys and Individual
13 Members of the Lunada Bay Boys. Plaintiffs are informed
14 and believe that Mr. Ferrara is the son of Defendant Angelo
15 Ferraro and brother to Defendant N.F. Plaintiffs anticipate
16 that this witness has information related to (a) the inner
17 workings of the Lunada Bay Boys and the methods to keep
18 non-locals from the beach, (b) illegal activities at Lunada Bay.
19 Mr. Ferrara is being listed as a potential percipient witness.

20 46) Fred Strater, contact information unknown, on the allegations
21 set forth in the Complaint related to Defendant Lunada Bay
22 Boys and the Individual Members of the Lunada Bay Boys.
23 Mr. Strater is a former resident of the City of Palos Verdes
24 Estates and maintains strong connections to the community.
25 Plaintiffs believe that Mr. Strater is a Lunada Bay Local.
26 Specifically, it is anticipated that Mr. Strater's testimony will
27 include but not be limited to the following: (a) information
28 regarding his former roommate, Charles Mowat, as an

1 enforcer and one of the worst Lunada Bay Locals; (b)
2 information regarding the relationship between Michael S.
3 Papayans, Charles Mowatt and the people “running the bay;”
4 (c) tactics used to keep non-locals from coming to Lunada
5 Bay; (d) conversations with John Lessing; (e) other illegal
6 activities. Mr. Strater is being listed as a potential percipient
7 witness.

8 47) Bruce Turner. Contact info believed to be:

9 bruce@turnerbuilt.com, on the allegations set forth in the
10 Complaint related to Defendant Lunada Bay Boys and
11 Individual Members of the Lunada Bay Boys. Mr. Turner is
12 included in key email communications from Defendant Sang
13 Lee that describe Bay Boy tactics to keep outsiders and non-
14 locals from surfing Lunada Bay. Mr. Turner attended and was
15 a key participant in many of the Danny Day Celebrations. It is
16 anticipated that this witness has information regarding: 1) the
17 inner workings of the Lunada Bay Boys and the methods to
18 keep non-locals from the beach, 2) illegal activities at Lunada
19 Bay. Mr. Turner is a Lunada Bay Local and is being listed as
20 a potential percipient witness and possible defendant.

21 48) David Jessup. Contact info believed to be:

22 dj90274@yahoo.com, on the allegations set forth in the
23 Complaint related to Defendant Lunada Bay Boys and
24 Individual Members of the Lunada Bay Boys. Mr. Jessup is
25 included in key email communications from Defendant Sang
26 Lee that describe Bay Boy tactics to keep outsiders and non-
27 locals from surfing Lunada Bay. It is anticipated that this
28 witness has information regarding: 1) the inner workings of

1 the Lunada Bay Boys and the methods to keep non-locals
2 from the beach, 2) illegal activities at Lunada Bay. Mr. Jessup
3 is a Lunada Bay Local and is being listed as a potential
4 percipient witness and possible defendant.

5 49) Tony Pazanowski, contact information unknown, on the
6 allegations set forth in the Complaint related to Defendant
7 Lunada Bay Boys and the Individual Members of the Lunada
8 Bay Boys. Plaintiffs are informed and believe that Mr.
9 Pazanowski was a former resident of the City of Palos Verdes
10 Estates having graduated PV High School and maintains
11 strong connections to the community. Several people have
12 reported that this witness surfs the Bay and has posted
13 comments on social media supporting Lunada Bay localism.
14 Plaintiffs are listing Mr. Pazanowski as a potential percipient
15 witness.

16 50) Robert Friedman. Contact info believed to be:
17 rwfriedman@yahoo.com, on the allegations set forth in the
18 Complaint related to Defendant Lunada Bay Boys and
19 Individual Members of the Lunada Bay Boys. Mr. Friedman is
20 included in key email communications from Defendant Sang
21 Lee that describe Bay Boy tactics to keep outsiders and non-
22 locals from surfing Lunada Bay. It is anticipated that this
23 witness has information regarding: 1) the inner workings of
24 the Lunada Bay Boys and the methods to keep non-locals
25 from the beach, 2) illegal activities at Lunada Bay. Mr.
26 Friedman is a Lunada Bay Local and is being listed as a
27 potential percipient witness and possible defendant.

28 51) Bruce Vail Rory. Contact info unknown, on the allegations set

1 forth in the Complaint related to Defendant Lunada Bay Boys
2 and Individual Members of the Lunada Bay Boys. Mr. Rorty is
3 an attorney licensed to practice law in the State of California.
4 Plaintiffs are informed believe that this witness has
5 information regarding: 1) an incident where he harassed an
6 attorney named Joe Cardella at Lunada Bay, 2) Michael S.
7 Papayans brought Mr. Cardella by Mr. Rortys home to make
8 sure Rorty did not bother Cardella again, 3) the inner
9 workings of the Lunada Bay Boys and the methods to keep
10 non-locals from the beach, 4) illegal activities at Lunada Bay.
11 Mr. Rortys is a Lunada Bay Local and is being listed as a
12 potential percipient witness and possible defendant.

13 52) Brookes Bennett. Contact info unknown, on the allegations
14 set forth in the Complaint related to Defendant Lunada Bay
15 Boys and Individual Members of the Lunada Bay Boys. Mr.
16 Bennett is a Lunada Bay Local. It is anticipated that this
17 witness has information regarding: 1) the inner workings of
18 the Lunada Bay Boys and the methods to keep non-locals
19 from the beach, 2) illegal activities at Lunada Bay. Mr.
20 Bennett is being listed as a potential percipient witness and
21 possible defendant.

22 53) David Hilton, a longtime resident of Palos Verdes Estates, on
23 the allegations set forth in the Complaint related to Defendant
24 Lunada Bay Boys, the Individual Members of the Lunada Bay
25 Boys and communications with Defendant City of Palos
26 Verdes Estates. Plaintiffs are informed and believe that this
27 witness is a long time surfer of Lunada Bay. It is anticipated
28 that Mr. Hilton has information regarding illegal activities by

1 the Bay Boys to keep non-locals away from Lunada Bay
2 including: (a) January 22, 1995 incident where a surfer from
3 Brazil (documented in Incident Report 95-0062) went to
4 Lunada Bay to surf and was confronted by Mr. Hilton and
5 several other Bay Boys who made threats of violence against
6 him causing him to reasonably believe that if he exercised his
7 right surf at a public beach, Hilton and/or the Lunada Bay
8 Boys would commit violence against him or his car and that
9 Hilton and/or the Lunada Bay Boys with him had the apparent
10 ability to carry out the threats; (b) the inner workings of the
11 Lunada Bay Boys and the methods to keep non-locals from
12 the beach. Plaintiffs are informed and believe that Mr. Hilton
13 is one of the participants in a text message conversation
14 started by Charlie Mowat on March 30, 2016 (the day after
15 this action was filed) to Defendant Alan Johnston, David
16 Hilton, Michael Thiel and others. In that that text message
17 conversation, Hilton states: "Total joke of a lawsuit wil
18 fail...There is hopefully no evidence that those named barred
19 the plaintiffs from going surfing..." Mr. Hilton is being listed as
20 a potential percipient witness and possible defendant.

21 54) Daniel Dreiling, contact information unknown, on the
22 allegations set forth in the Complaint related to Defendant
23 City of Palos Verdes Estates, Defendant Lunada Bay Boys
24 and Individual Members of the Lunada Bay Boys.

25 55) Paul Hugoboom. Contact info unknown, on the allegations set
26 forth in the Complaint related to Defendant Lunada Bay Boys
27 and Individual Members of the Lunada Bay Boys. Mr.
28 Hugoboom is a Lunada Bay Local. It is anticipated that this

1 witness has information regarding: 1) the inner workings of
2 the Lunada Bay Boys and the methods to keep non-locals
3 from the beach, 2) illegal activities at Lunada Bay. Mr.
4 Hugoboom is being listed as a potential percipient witness
5 and possible defendant.

6 56) Brad Travers. (310)701-1810 Plaintiffs are informed and
7 believe that after the incident Defendant Johnston started
8 calling and/or texting other Lunada Bay locals to check for
9 police to plan a getaway. At around 1:00 pm Brad Travers
10 (Travers Tree Service) texted Johnston: "Don't see any cops
11 at the top."

12 57) Chuck Becker, contact information unknown, on the
13 allegations set forth in the Complaint related to Defendant
14 Lunada Bay Boys and Individual Members of the Lunada Bay
15 Boys. Plaintiffs are informed and believe that Chuck Becker
16 is a local lifetime South Bay surfer, who has surfed Lunada
17 Bay. Plaintiffs anticipate that this witness has information
18 related to an incident wherein Mr. Becker's tires were slashed
19 while he surfed at Lunada Bay.

20 58) Ron Bornstein, contact information unknown, on the
21 allegations set forth in the Complaint related to Defendant
22 Lunada Bay Boys and Individual Members of the Lunada Bay
23 Boys. Plaintiffs are informed and believe that Mr. Bornstein is
24 a former resident of the City of Palos Verdes Estates.
25 Plaintiffs are informed and believe that Mr. Bornstein or
26 "Borno" is a graduate of PV High School who used to surf
27 Lunada Bay. Mr. Bornstein is being listed as a potential
28 percipient witness.

1 59) Joel Milam, 30571 Rue De La Pierre, Rancho Palos Verdes,
2 CA 90275, on the allegations set forth in the Complaint
3 related to Defendant Lunada Bay Boys and Individual
4 Members of the Lunada Bay Boys. Plaintiffs are informed and
5 believe that Mr. Milam was a former resident of the City of
6 Palos Verdes Estates and graduate of PV High School. Mr.
7 Milam surfs Lunada Bay regularly and has been identified by
8 Charlie Ferrara as one of the main Bay Boys. Mr. Milam is a
9 Lunada Bay Local and is being listed as a potential percipient
10 witness and possible defendant.

11 60) James Reinhardt, contact information unknown, on the
12 allegations set forth in the Complaint related to Defendant
13 Lunada Bay Boys and Individual Members of the Lunada Bay
14 Boys. Plaintiffs are informed and believe that Mr. Reinhardt is
15 a longtime resident of the City of Palos Verdes Estates having
16 graduated from Palos Verdes High School in 1978. Plaintiffs
17 believe that Mr. Reinhardt is a Lunada Bay Local and is being
18 listed as a potential percipient witness and possible
19 defendant.

20 61) Mark Bonney, contact information unknown, on the
21 allegations set forth in the Complaint related to Defendant
22 Lunada Bay Boys and the Individual Members of the Lunada
23 Bay Boys. Plaintiffs are informed and believe that Mr. Bonney
24 is a former resident of the City of Palos Verdes Estates and
25 graduate of PV High School and maintains strong
26 connections to the community. Plaintiffs are informed and
27 believe that Mr. Bonney has information regarding the
28 activities of the Lunada Bay Boys by comments made on

1 social media defending the actions of the Lunada Bay Locals.
2 Mr. Bonney is being listed as a potential percipient witness
3 and possible defendant.

4 62) Eric Hilton, contact information unknown, on the allegations
5 set forth in the Complaint related to Defendant Lunada Bay
6 Boys, the Individual Members of the Lunada Bay Boys and
7 communications with Defendant City of Palos Verdes Estates.
8 Plaintiffs are informed and believe that this witness is a
9 longtime surfer of Lunada Bay and resident of Palos Verdes
10 Estates. It is anticipated that this witness has information
11 regarding: (a) the inner workings of the Lunada Bay Boys and
12 the methods to keep non-locals from the beach; (b) illegal
13 activities at Lunada Bay. Mr. Hilton is being listed as a
14 potential percipient witness and possible defendant.

15 63) Kelly Logan, 714 Angelus Pl, Venus, CA 90291-4919, on the
16 allegations set forth in the Complaint related to Defendant
17 Lunada Bay Boys and the Individual Members of the Lunada
18 Bay Boys. Plaintiffs are informed and believe that Mr. Logan
19 is a former resident of the City of Palos Verdes Estates and
20 maintains strong connections to the community. Plaintiffs are
21 informed and believe that Mr. Logan was involved in the
22 assault by Peter McCollum against Geoff Hagins and several
23 others reflected in Incident Report 95-0381. Plaintiffs believe
24 that Mr. Logan is a Lunada Bay Local and is being listed as a
25 potential percipient witness and possible defendant.

26 64) John Rall, contact information unknown, on the allegations set
27 forth in the Complaint related to Defendant Lunada Bay Boys
28 and the Individual Members of the Lunada Bay Boys.

1 Plaintiffs are informed and believe that Mr. Rall graduated PV
2 High School in 1991 and maintains strong connections to the
3 community. Plaintiffs believe that Mr. Rall is a Lunada Bay
4 Local and is being listed as a potential percipient witness and
5 possible defendant.

6 65) Jim Russi, contact information unknown, on the allegations
7 set forth in the Complaint related to Defendant Lunada Bay
8 Boys and the Individual Members of the Lunada Bay Boys.
9 Plaintiffs are informed and believe that Mr. Russi is a former
10 resident of the City of Palos Verdes Estates and maintains
11 strong connections to the community – possibly still owning a
12 home on the cliffs above Lunada Bay. Plaintiffs are informed
13 and believe and on that basis allege that this witness has
14 information regarding the illegal activities of the Lunada Bay
15 Boys including the Ferraras. While this witness claims to have
16 moved from the area years ago, he has publicly defended the
17 actions of the Lunada Bay Boys. Plaintiffs believe that Mr.
18 Russi is a Lunada Bay Local and is being listed as a potential
19 percipient witness.

20 66) Chelsea Griep, contact information unknown, on the
21 allegations set forth in the Complaint related to Defendant
22 Lunada Bay Boys and the Individual Members of the Lunada
23 Bay Boys. Ms. Griep is the daughter of Defendant in the state
24 court action, Los Angeles Superior Court Case No.
25 BC629596, Mark Griep. Plaintiffs are informed and believe
26 that this witness has information regarding the activities of the
27 Lunada Bay Boys by comments made on social media
28 supporting the exclusion of all non-locals from Lunada Bay.

- 1 67) Carlos Anorga, 4040 Spencer St., Suite J, Torrance, CA
2 90503; (310) 371-7762, on the allegations set forth in the
3 Complaint related to Defendant Lunada Bay Boys and the
4 Individual Members of the Lunada Bay Boys. Plaintiffs are
5 informed and believe that Mr. Anorga is a longtime Lunda Bay
6 local surfer and is listed as a possible percipient witness.
- 7 68) Mark Koehler, address unknown, (808) 639-1668, on the
8 allegations set forth in the Complaint related to Defendant
9 Lunada Bay Boys and the Individual Members of the Lunada
10 Bay Boys. Plaintiffs believe that Mr. Koehler is a Lunada Bay
11 Local and is being listed as a potential percipient witness.
- 12 69) Chad Beatty, 1104 S. Juanita Ave., Redondo Beach, CA
13 90277, on the allegations set forth in the Complaint related to
14 Defendant Lunada Bay Boys and the Individual Members of
15 the Lunada Bay Boys. Plaintiffs believe Mr. Beatty has been
16 surfing Lunada Bay for years and is listed as a possible
17 percipient witness. At this time, Plaintiffs do not have any
18 specific information regarding this witness.
- 19 70) Jason Buck, contact information unknown, on the allegations
20 set forth in the Complaint related to Defendant Lunada Bay
21 Boys and the Individual Members of the Lunada Bay Boys.
22 This person has been surfing Lunada Bay for years and is
23 listed as a possible percipient witness. This percipient witness
24 has information regarding: (a) An incident involving that
25 occurred on October 10, 2015 documented in Officer Report
26 for Incident 15-12058. Plaintiffs believe that Mr. Buck is a
27 Lunada Bay Local and is being listed as a potential percipient
28 witness.

1 71) Derek Daigneault, contact information unknown, on the
2 allegations set forth in the Complaint related to Defendant
3 Lunada Bay Boys and the Individual Members of the Lunada
4 Bay Boys. Plaintiffs are listing Mr. Daigneault as a potential
5 percipient witness.

6 72) Daniel Dreiling Jr., contact information unknown, on the
7 allegations set forth in the Complaint related to Defendant
8 Lunada Bay Boys and the Individual Members of the Lunada
9 Bay Boys. Plaintiffs are informed and believe that this witness
10 is the son of the former Chief of Police for Palos Verdes
11 Estates and because of his father's job was permitted to surf
12 Lunada Bay. Plaintiffs are informed and believe that Mr.
13 Dreiling built at least one knee board for Defendant Brant
14 Blakeman. Mr. Dreiling is being listed as a potential percipient
15 witness.

16 73) Danny Ecker, contact information unknown, on the allegations
17 set forth in the Complaint related to Defendant Lunada Bay
18 Boys and the Individual Members of the Lunada Bay Boys.
19 Plaintiffs are informed and believe that this person grew up in
20 Palos Verdes Estates and surfed Lunada Bay for years and is
21 listed as a possible percipient witness. At this time, Plaintiffs
22 do not have any specific information regarding this witness.
23 Plaintiffs believe that Mr. Ecker is being listed as a potential
24 percipient witness.

25 74) Pat Ecker, contact information unknown, on the allegations
26 set forth in the Complaint related to Defendant Lunada Bay
27 Boys and the Individual Members of the Lunada Bay Boys.
28 This person has been surfing Lunada Bay for years and is

1 listed as a possible percipient witness. At this time, Plaintiffs
2 do not have any specific information regarding this witness.
3 Plaintiffs believe that Mr. Ecker is being listed as a potential
4 percipient witness.

5 75) Greg Cahill, contact information unknown, on the allegations
6 set forth in the Complaint related to Defendant Lunada Bay
7 Boys and the Individual Members of the Lunada Bay Boys.
8 Plaintiffs were contacted by a witness that stated that Mr.
9 Cahill was one of a group of Bay Boys that approached him
10 on top of the bluff while he was attempting to surf Lunada Bay
11 and threatened him with violence and damage to his car when
12 if he went down the trail. Mr. Cahill is being listed as a
13 percipient witness and possible defendant.

14 76) Alex Hooks, contact information unknown, on the allegations
15 set forth in the Complaint related to Defendant Lunada Bay
16 Boys and the Individual Members of the Lunada Bay Boys. At
17 this time, Plaintiffs do not have any specific information
18 regarding this witness. Plaintiffs believe that Mr. Hooks may
19 surf the bay and is being listed as a potential percipient
20 witness.

21 77) Derek Ellis. contact information unknown, on the allegations
22 set forth in the Complaint related to Defendant Lunada Bay
23 Boys and the Individual Members of the Lunada Bay Boys.

24 78) Leonora Beukema, 2817 Palos Verdes Dr., Palos Verdes
25 Estates, CA 90274, on the allegations set forth in the
26 Complaint related to Defendant Lunada Bay Boys and the
27 Individual Members of the Lunada Bay Boys. Plaintiffs are
28 informed and believe that Ms. Beukema is married to

1 Defendant Angelo Ferrara and anticipate that she will testify
2 related to the following: 1) the inner workings of the Lunada
3 Bay Boys and the methods to keep non-locals from the
4 beach; 2) her son, Anthony Beukema's, activities in the
5 Lunada Bay Boys; 2) illegal activities at Lunada Bay; 3)
6 statements she made to the Daily Breeze regarding the
7 January 20, 2014 incident, at a public surfing event at Lunada
8 on Martin Luther King, Jr. Day, where a Lunada Bay Boy that
9 had his face painted in black makeup and wore a black Afro
10 wig left her house to go to the event. Plaintiffs' list this
11 witness as a percipient witness.

12 OTHER

13 79) Jordan Wright, can be contacted through Plaintiffs' counsel,
14 on the subjects set forth in the Complaint, to which he was a
15 percipient witness. Specifically, Mr. Wright is expected to
16 testify regarding several incidents that he has had with
17 Individual members of the Lunada Bay Boys over the 2 – 3
18 years that he has attempted surf the break, including but not
19 limited to the following: (a) being assaulted on January 29,
20 2016 by David Melo; (b) February 13, 2016 incident with
21 Plaintiff Diana Reed; (c) other incidents when he attempted to
22 surf Lunada Bay.

23 80) Nick Borgens, contact information unknown, on the
24 allegations set forth in the Complaint related to Defendant
25 Lunada Bay Boys and the Individual Members of the Lunada
26 Bay Boys. Plaintiffs are informed and believe that Mr. Borgens
27 has attempted to surf Lunada Bay and has been subjected to
28 harassment by the Bay Boys.

1 81) Tommy Allen. Contact information not known. Mr. Allen is the
2 grandson for a former Superior Court Judge who wrote an
3 article describing harassment he received at the hands of
4 PVE locals.

5 82) Gavin Heaney. on the allegations set forth in the Complaint
6 related to Defendant Lunada Bay Boys and the Individual
7 Members of the Lunada Bay Boys. It is anticipated that Mr.
8 Heaney will testify that he was denied entrance to Lunada
9 Bay on top of the bluff while attempting to surf there by six or
10 more Bay Boys who threatened him with violence and
11 damage to his property if he went down the trail. Fearing for
12 his safety, he quickly left the area. It is further anticipated this
13 witness will testify that Greg Cahill was one of the people who
14 threatened him.

15 83) Tyler Canali. on the allegations set forth in the Complaint
16 related to Defendant Lunada Bay Boys and the Individual
17 Members of the Lunada Bay Boys. Canali will testify that he is
18 not from Palos Verdes Estates. It is anticipated that he will
19 testify that he was harassed by the Lunada Bay Boys. They
20 kept telling him "Don't bother going out, you're not going to get
21 a wave." He will state that the Individual Bay Boys cut him off
22 on every wave. He will further testify that Individual Bay Boys
23 surrounded him in the water in an effort to intimidate him.
24 They were as close as they could be, no one saying a word,
25 just staring him down. Eventually Canali made his way to
26 shore, where more hecklers awaited. They called him a "kook"
27 told him to leave.

28 84) Jimmy Conn. on the allegations set forth in the Complaint

1 related to Defendant Lunada Bay Boys and the Individual
2 Members of the Lunada Bay Boys. Specifically, it is
3 anticipated that this witness will testify that he started surfing
4 Lunada Bay around 1976 on really big swells. Because most
5 of the locals are not good surfers, they would not be in the
6 water when he surfed but would still threaten, harass and
7 throw rocks at him. On one occasion, he was hit by a rock and
8 needed 17 stitches in his lip. He still has the scar.

9 85) Daniel Dorn, can be contacted through Plaintiffs' counsel, on
10 the allegations set forth in the Complaint related to Defendant
11 Lunada Bay Boys and the Individual Members of the Lunada
12 Bay Boys. It is anticipated that Mr. Dorn will testify that he is a
13 semiprofessional body boarder from Redondo Beach and that
14 he had never surfed Lunada Bay for fear of violence. He
15 attended one of Taloa's surfing events at Lunada Bay
16 because he felt it would be safe. It is anticipated that he will
17 testify even though the police were present they would not
18 tell him if it was safe. Upon greeting the pack with a hello, he
19 was assailed by profanities and threats. He will testify that a
20 Bay Boy in a kayak told him to leave and threatened him. It is
21 anticipated that Mr. Dorn will testify that Individual Bay Boys
22 dropped in on him and tried to run him over with their
23 surfboards until he left.

24 86) Geoff Hagins, can be contacted through Plaintiffs' counsel, on
25 the allegations set forth in the Complaint related to Defendant
26 Lunada Bay Boys and the Individual Members of the Lunada
27 Bay Boys. Plaintiffs anticipate that Mr. Hagins will testify that
28 himself, John Hagins, Mike Bernard, Mike Bernard, Jr, Charlie

1 Rigano and Doug Disanti were accosted by Peter McCollum
2 and several other Bay Boys as reflected in Incident Report
3 95-0381.

4 87) John Hagins, contact information unknown, on the allegations
5 set forth in the Complaint related to Defendant Lunada Bay
6 Boys and the Individual Members of the Lunada Bay Boys.
7 Plaintiffs anticipate that Mr. Hagins will testify that himself,
8 Geoff Hagins, Mike Bernard, Mike Bernard, Jr, Charlie Rigano
9 and Doug Disanti were accosted by Peter McCollum and
10 several other Bay Boys as reflected in Incident Report 95-
11 0381.

12 88) Mike Bernard, contact information unknown, on the
13 allegations set forth in the Complaint related to Defendant
14 Lunada Bay Boys and the Individual Members of the Lunada
15 Bay Boys. Plaintiffs anticipate that Mr. Bernard will testify that
16 himself, Geoff Hagins, John Hagins. Mike Bernard, Jr, Charlie
17 Rigano and Doug Disanti were accosted by Peter McCollum
18 and several other Bay Boys as reflected in Incident Report
19 95-0381.

20 89) Mike Bernard, Jr. contact information unknown, on the
21 allegations set forth in the Complaint related to Defendant
22 Lunada Bay Boys and the Individual Members of the Lunada
23 Bay Boys. Plaintiffs anticipate that Mr. Bernard, Jr. will testify
24 that himself, Geoff Hagins, John Hagins, Mike Bernard,
25 Charlie Rigano and Doug Disanti were accosted by Peter
26 McCollum and several other Bay Boys as reflected in Incident
27 Report 95-0381.

28 90) Charlie Rigano, contact information unknown, on the

1 allegations set forth in the Complaint related to Defendant
2 Lunada Bay Boys and the Individual Members of the Lunada
3 Bay Boys. Plaintiffs anticipate that Mr. Rigano will testify that
4 himself, Geoff Hagins, John Hagins, Mike Bernard, Mike
5 Bernard, Jr, and Doug Disanti were accosted by Peter
6 McCollum and several other Bay Boys as reflected in Incident
7 Report 95-0381.

8 91) Doug Disanti, contact information unknown, on the allegations
9 set forth in the Complaint related to Defendant Lunada Bay
10 Boys and the Individual Members of the Lunada Bay Boys.
11 Plaintiffs anticipate that Mr. Disanti will testify that himself,
12 Geoff Hagins, John Hagin, Mike Bernard, Mike Bernard, Jr,
13 and Charlie Rigano were accosted by Peter McCollum and
14 several other Bay Boys as reflected in Incident Report 95-
15 0381.

16 92) Kurt Stanphenhorst, contact information unknown, on the
17 allegations set forth in the Complaint related to Defendant
18 Lunada Bay Boys and the Individual Members of the Lunada
19 Bay Boys. It is anticipated that this witness will testify that he
20 was shot at with a pellet gun by an Individual Bay Boy.

21 93) Randy Clark, contact information unknown, on the allegations
22 set forth in the Complaint related to Defendant Lunada Bay
23 Boys and the Individual Members of the Lunada Bay Boys.

24 94) John Innis, can be contracted through Plaintiffs' counsel, on
25 the allegations set forth in the Complaint related to Defendant
26 Lunada Bay Boys and the Individual Members of the Lunada
27 Bay Boys. This witness will testify that he was harassed by
28 Individual Bay Boys while trying to take photographs and that

- 1 he filed a police report but nothing came of it.
- 2 95) Trish Laurie, contact information unknown, on the allegations
- 3 set forth in the Complaint related to Defendant Lunada Bay
- 4 Boys and the Individual Members of the Lunada Bay Boys. It
- 5 is anticipated that Ms. Laurie will testify that she was sexually
- 6 harassed/assaulted at Lunada Bay. It is anticipated that she
- 7 will say that certain individuals dropped "dropped their towels
- 8 and jerked off to her." Ms. Laurie is being listed as a possible
- 9 percipient witness.
- 10 96) Ken Claypool, can be contacted through Plaintiffs' counsel, on
- 11 the allegations set forth in the Complaint related to Defendant
- 12 Lunada Bay Boys and the Individual Members of the Lunada
- 13 Bay Boys. This witness will testify about several incidents of
- 14 harassment at Lunada Bay involving Individuals such as
- 15 Brant Blakeman and possibly one or more of the Ferraras.
- 16 97) Tom Wilson, contact information unknown, on the allegations
- 17 set forth in the Complaint related to Defendant Lunada Bay
- 18 Boys and the Individual Members of the Lunada Bay Boys.
- 19 98) Martin Tueling, contact information unknown, on the
- 20 allegations set forth in the Complaint related to Defendant
- 21 Lunada Bay Boys and the Individual Members of the Lunada
- 22 Bay Boys.
- 23 99) Bernie Mann, contact information unknown, on the allegations
- 24 set forth in the Complaint related to Defendant Lunada Bay
- 25 Boys and the Individual Members of the Lunada Bay Boys.
- 26 100) Dr. Stephen Young, can be contacted through Plaintiffs'
- 27 counsel, on the allegations set forth in the Complaint related
- 28 to Defendant Lunada Bay Boys and the Individual Members

1 of the Lunada Bay Boys. It is anticipated that Dr. Young will
2 testify that while attending medical school he tried many times
3 to enjoy the break at Lunada Bay and on every occasion was
4 bullied to leave the area. He will testify that his vehicle was
5 damaged many times, including slashed tires, scratches on
6 the painted surfaces and broken windows. He will testify that
7 there was a few occasions that he feared for his life. He will
8 state that he filed a police report but nothing was done.

9 101) Hagan Kelly, contact information unknown, on the allegations
10 set forth in the Complaint related to Defendant Lunada Bay
11 Boys and the Individual Members of the Lunada Bay Boys.

12 102) Sef Krell, may be contacted through Plaintiffs' counsel, on the
13 allegations set forth in the Complaint related to Defendant
14 Lunada Bay Boys and the Individual Members of the Lunada
15 Bay Boys. Specifically, Mr. Krell has information related to the
16 incident that occurred on or around November 15, 2014.

17 103) Alan Haven, can be contacted through Plaintiffs' counsel, on
18 the allegations set forth in the Complaint related to Defendant
19 Lunada Bay Boys and the Individual Members of the Lunada
20 Bay Boys. Mr. Haven is a resident of Palos Verdes Estates
21 and will testify regarding the video of an assault that he took
22 on October 10, 2015.

23 104) Daniel R. Jongeward, can be contacted through Plaintiffs'
24 counsel, on the allegations set forth in the Complaint related
25 to Defendant Lunada Bay Boys and the Individual Members
26 of the Lunada Bay Boys. Specifically, it is anticipated that Mr.
27 Jongeward will testify that: (a) he is not a resident of Palos
28 Verdes Estates; (b) he was a big wave surfer but rides

1 longboards and guns; (c) he has attempted to surf Lunada
2 Bay on several occasions. Because of the reputation, he went
3 alone and early in the morning. He has had dirt clods and
4 rocks thrown at him. He has been physically threatened.
5 People threatened to vandalize his car. Because he believes
6 that the Lunada Bay Boys have the ability to physically harm
7 him and his property he made the decision not to return.

8 105) Patrick Landon, contact information unknown, on the
9 allegations set forth in the Complaint related to Defendant
10 Lunada Bay Boys and the Individual Members of the Lunada
11 Bay Boys.

12 106) Frank Netto, can be contacted through Plaintiffs' counsel, on
13 the allegations set forth in the Complaint related to Defendant
14 Lunada Bay Boys and the Individual Members of the Lunada
15 Bay Boys.

16 107) Randy Miestrell, contact information unknown, on the
17 allegations set forth in the Complaint related to Defendant
18 Lunada Bay Boys and the Individual Members of the Lunada
19 Bay Boys. This witness has been quoted in numerus articles
20 over the years and is listed as a possible percipient witness.

21 108) Sharlean Perez, can be contacted through Plaintiffs' counsel,
22 on the allegations set forth in the Complaint related to
23 Defendant Lunada Bay Boys and the Individual Members of
24 the Lunada Bay Boys. It is anticipated that this witness will
25 testify that she and her boyfriend tried to hike down the trail to
26 Lunada Bay and people started throwing glass bottles "near"
27 and "around" them. She and her boyfriend at the time were
28 not from PVE.

- 1 109) Charles Michael Pinkerton, can be contacted through
2 Plaintiffs' counsel, on the allegations set forth in the
3 Complaint related to Defendant Lunada Bay Boys and the
4 Individual Members of the Lunada Bay Boys. It is anticipated
5 that Mr. Pinkerton will testify that he is an aerospace engineer
6 with a Master's Degree who has made several attempts to
7 surf Lunada Bay. He will state that he has been verbally
8 harassed, threatened with violence, and had his things thrown
9 in the water. He has had all four tires flattened, his windows
10 waxed; and his backpack thrown in the water while he was
11 out surfing.
- 12 110) Mike Purpus, contact information unknown, on the allegations
13 set forth in the Complaint related to Defendant Lunada Bay
14 Boys and the Individual Members of The Lunada Bay Boys.
15 This witness is a former professional surfer who has written
16 articles about localism at Lunada Bay and is listed as a
17 possible percipient witness.
- 18 111) Mike Stevens, Los Angeles County District Attorney's Office,
19 210 West Temple Street, Los Angeles, CA 90012, on the
20 allegations set forth in the Complaint related to Defendant
21 Lunada Bay Boys and the Individual Members of the Lunada
22 Bay Boys. Plaintiffs have been informed that Mr. Stevens is
23 an investigator with the Los Angeles District Attorney's Office
24 and that he was hassled by the Bay Boys when attempting to
25 surf Lunada Bay. Neither Plaintiffs nor their attorneys have
26 spoken directly with Mr. Stevens. He is listed as a possible
27 percipient witness.
- 28 112) Christopher Taloa, can be contacted through Plaintiffs'

1 counsel, on the allegations set forth in the Complaint related
2 to Defendant Lunada Bay Boys and the Individual Members
3 of the Lunada Bay Boys. Specifically, it is anticipated that Mr.
4 Taloa will testify regarding several incidents.

5 113) John MacHarg, can be contacted through Plaintiffs' counsel.
6 Plaintiffs anticipate that Mr. MacHarg will testify that while
7 visiting Lunada Bay on January 29, 2016 he was standing
8 just under the patio on the rocks when Defendant Sang Lee
9 (local surfer/enforcer) who was standing on top of the patio
10 poured out a portion of the beer he was holding on to his
11 head. This happened right in front two officers that were
12 standing 6 feet to his right.

13 114) Andy MacHarg, can be contacted through Plaintiffs' counsel,
14 on the allegations set forth in the Complaint related to
15 Defendant Lunada Bay Boys and the Individual Members of
16 the Lunada Bay Boys. Plaintiffs anticipate Mr. MacHarg will
17 testify about being harassed while attempting to surf at
18 Lunada Bay.

19 115) Jason Gersch, can be contacted through plaintiffs counsel, on
20 the allegations set forth in the Complaint related to Defendant
21 Lunada Bay Boys and the Individual Members of the Lunada
22 Bay Boys. Plaintiffs anticipate Mr. Gersch will testify about
23 being harassed while attempting to surf at Lunada Bay.

24 116) Jim Light, 603 S. Broadway, Redondo Beach, 540-8934
25 (home) or 348-6339 (work) President of the Surf Rider
26 Foundation 2002 on issue of localism and working with City of
27 PVE - recommendation of the Surf Rider Foundation and ask
28 the City staff to prepare an ordinance that we can review with

1 the intent of adoption similar to what Redondo Beach has and
2 perhaps expand it to include addressing the issue of blocking
3 access to the beach and see that the "patios" be dismantled
4 and removed.

5 117) Tim Tindall, can be contacted through Plaintiffs' counsel, on
6 the allegations set forth in the Complaint related to Defendant
7 Lunada Bay Boys and the Individual Members of the Lunada
8 Bay Boys. It is anticipated that Mr. Tindell will testify about
9 being harassed while attempting to body board Wally's.

10 118) Rory Carroll, contact information unknown, on the allegations
11 set forth in the Complaint related to Defendant Lunada Bay
12 Boys and the Individual Members of the Lunada Bay Boys.
13 Specifically, Mr. Carroll is expected to testify regarding the
14 contents of this

15 video:[https://www.theguardian.com/travel/video/2015/may/18/](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
16 [california-surf-wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)

17 119) Noah Smith, contact information unknown, on the allegations
18 set forth in the Complaint related to Defendant Lunada Bay
19 Boys and the Individual Members of the Lunada Bay Boys.
20 Specifically, Mr. Carroll is expected to testify regarding the
21 contents of this video:

22 [https://www.theguardian.com/travel/video/2015/may/18/califor](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
23 [nia-surf-wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)

24 120) Karl R. Bingemann, contact information unknown, on the
25 subject of the declaration submitted to the California Coastal
26 Commission regarding trail access.

27 121) William C. Brand, contact information unknown, on the subject
28 of the declaration submitted to the California Coastal

- 1 Commission regarding trail access.
- 2 122) Kurt Buettgenbach, contact information unknown, on the
- 3 subject of the declaration submitted to the California Coastal
- 4 Commission regarding trail access.
- 5 123) Sean Criss, contact information unknown, on the subject of
- 6 the declaration submitted to the California Coastal
- 7 Commission regarding trail access.
- 8 124) Douglas Leach, contact information unknown, on the subject
- 9 of the declaration submitted to the California Coastal
- 10 Commission regarding trail access.
- 11 125) Ian McDonald, contact information unknown, on the subject of
- 12 the declaration submitted to the California Coastal
- 13 Commission regarding trail access.
- 14 126) John R. McGrath, Jr., contact information unknown, on the
- 15 subject of the declaration submitted to the California Coastal
- 16 Commission regarding trail access.
- 17 127) Colin McNany, contact information unknown, on the subject of
- 18 the declaration submitted to the California Coastal
- 19 Commission regarding trail access.
- 20 128) Bruce V. Rorty, contact information unknown, on the subject
- 21 of the declaration submitted to the California Coastal
- 22 Commission regarding trail access.
- 23 129) Officer Charles H. Avington, presumably can be contacted
- 24 through counsel for the City on the subject regarding Officer
- 25 Report for Incident DR 010008.
- 26 130) Officer Kenneth Ackert Badge # 725 / Patrice Ann Santucci /
- 27 Margaret A, Doherty, presumably can be contacted through
- 28 counsel for the City, on the subject regarding Officer Report

- 1 for Incident DR 010864.
- 2 131) Officers R. Castro / C. Simon, presumably can be contacted
- 3 through counsel for the City, on the subject regarding Officer
- 4 Report for Incident 12-11606.
- 5 132) Officers Helinga / Wulf, presumably can be contacted through
- 6 counsel for the City, on the subject regarding Officer Report
- 7 for Incident 11-10919.
- 8 133) Officer Shinowsky, presumably can be contacted through
- 9 counsel for the City, on the subject regarding Officer Report
- 10 for Incident 95-0297.
- 11 134) Officer Belcher, presumably can be contacted through
- 12 counsel for the City, on the subject regarding Officer Report
- 13 for Incidents 95-0281, 95-0381.
- 14 135) Officers Velez / John C. Eberhard / Denise L. Allen,
- 15 presumably can be contacted counsel for the City, on the
- 16 subject regarding Officer Report(s) for Incidents 95-0418 and
- 17 97-0042.
- 18 136) Officers Denice L. Allen / John C. Eberhard / Steven N.
- 19 Barber, presumably can be contacted through counsel for the
- 20 City, on the subject regarding Officer Report for Incident 97-
- 21 0047.
- 22 137) Officers Richard J. Delmont / Patrick L. Hite, can presumably
- 23 be contacted through counsel for the City, on the subject
- 24 regarding Officer Report for Incident 98-0301.
- 25 138) Officers Cecilia T. Nguyen / Mark A. Velez / Valerie S. Hite,
- 26 can presumably be contacted through counsel for the City, on
- 27 the subject regarding Officer Report for Incident 99-0042.
- 28 139) Officers E. Gaunt / C. Reed, presumably can be contacted

1 through counsel for the City, on the subject regarding Officer
2 Report for Incident 09-00575.

3 140) Officers E. Gaunt / C. Reed, presumably can be contacted
4 through counsel for the City, on the subject regarding Officer
5 Report for Incident 09-00562.

6 141) Officers B. Hernandez / R. Venegas, presumably can be
7 contacted through counsel for the City, on the subject
8 regarding Officer Report for Incident 09-00693.

9 142) Officer B. Hernandez, presumably can be contacted through
10 counsel for the City, on the subject regarding Officer
11 Report for Incident 09-10183.

12 143) Officers L. Tejada / R. Delmont, presumably can be contacted
13 through counsel for the City, on the subject regarding Officer
14 Report for Incident 09-08872.

15 144) Officers C. Eberhard / S. Tomlins, presumably can be
16 contacted through counsel for the City, on the subject
17 regarding Officer Report for Incident 10-00265.

18 145) Officers B. Hernandez / C. Reed, presumably can be
19 contacted through counsel for the City, on the subject
20 regarding Officer Report for Incident 10-02408.

21 **B. Documents**

22 In accordance with F.R.C.P. 26(a)(1)(A)(ii), Plaintiffs identify the
23 following categories of documents in their possession, custody or control:

24 Police Reports:

- 25 1. Palos Verdes Estates Police Department, Officer Report for
26 Incident 16-01360, dated 1/22/95.
27 2. Palos Verdes Estates Police Department, Officer Report for
28 Incident 95-0219/0381, dated 3/13/95.

- 1 3. Palos Verdes Estates Police Department, Officer Report for
2 Incident 95-0297, dated 4/5/95.
- 3 4. Palos Verdes Estates Police Department, Officer Report for
4 Incident 95-0381, dated 4/26/95.
- 5 5. Palos Verdes Estates Police Department, Officer Report for
6 Incident 95-0381, dated 3/14/95.
- 7 6. Palos Verdes Estates Police Department, Officer Report for
8 Incident 95-0418, dated 5/7/95.
- 9 7. Palos Verdes Estates Police Department, Officer Report for
10 Incident 96-1037, dated 12/18/96.
- 11 8. Palos Verdes Estates Police Department, Officer Report for
12 Incident 97-0002, dated 1/1/97.
- 13 9. Palos Verdes Estates Police Department, Officer Report for
14 Incident 97-0042, dated 1/18/97.
- 15 10. Palos Verdes Estates Police Department, Officer Report for
16 Incident 97-0047, dated 1/19/97.
- 17 11. Palos Verdes Estates Police Department, Officer Report for
18 Incident 98-0301, dated 5/02/98.
- 19 12. Palos Verdes Estates Police Department, Officer Report for
20 Incident 99-0042, dated 1/16/99.
- 21 13. Palos Verdes Estates Police Department, Officer Report for
22 Incident 99-0077, dated 1/24/99.
- 23 14. Palos Verdes Estates Police Department, Officer Report for
24 Incident 09-00562, dated 1/19/09.
- 25 15. Palos Verdes Estates Police Department, Officer Report for
26 Incident 09-00693, dated 1/24/09.
- 27 16. Palos Verdes Estates Police Department, Officer Report for
28 Incident 09-08872, dated 10/15/09.

17. Palos Verdes Estates Police Department, Officer Report for Incident 09-10183, dated 11/28/09. – Sang Lee
18. Palos Verdes Estates Police Department, Officer Report for Incident 10-00265, dated 1/10/10.
19. Palos Verdes Estates Police Department, Officer Report for Incident 10-02408, dated 3/23/10.
20. Palos Verdes Estates Police Department, Officer Report for Incident 11-10919, dated 12/25/11.
21. Palos Verdes Estates Police Department, Officer Report for Incident 12-11606, dated 11/03/12.
22. Palos Verdes Estates Police Department, Officer Report for Incident 16-0136, dated 1/29/16.
23. Palos Verdes Estates Police Department, Officer Report for Incident 16-02164, dated 2/13/16.
24. Palos Verdes Estates Police Department, Officer Report for Incident DR # 17-00587.

Photos:

25. All photos attached as exhibits to the Complaint.
26. All photos attached as exhibits to the State Action BC629596.
27. Photographs of Lunada Bay taken in August 2015 and provided to Plaintiffs by City of Palos Verdes Estates in response to Public Records Act Request, Bates Nos. 1128-1151, 1267-1300.

Correspondence/Other:

28. Letter undated from Jim Russi to Ed Jaakola.
29. Letter dated January 21, 2016, from Jordan Sanchez of the California Coastal Commission to Jeff Kepley of the Palos Verdes Police Department.
30. Letter dated June 6, 2016, from Mr. Sanchez of the California

Coastal Commission to City Manager Anton Dahlerbruch.

31. Letter dated June 7, 2016, from City Manager Dahlerbruch to Mr. Sanchez.

32. July 12, 2016 Sheri Repp-Loadsmann, Deputy City Manager/Planning and Building Director issued a Memorandum to the City's Mayor and City Council.

33. Email chain dated April 4, 2016 between John MacHarg and Mark Velez.

34. Memo dated 12/31/15 from Chief Jeff Kepley' re PVE Surfing Localism in The Media This Week.

35. Memorandum from Anton Dahlerbruch to Honorable Mayor and City Council dated January 22, 2016, Subject City Managers Report for January 18- January 22, 2016.

36. Memorandum from Anton Dahlerbruch to Honorable Mayor and City Council dated January 29, 2016, Subject City Managers Report for January 25- January 29, 2016.

37. Memorandum from Anton Dahlerbruch to Honorable Mayor and City Council dated March 25, 2016, Subject City Managers Report for March 21 - March 25, 2016.

38. Letter dated January 12, 2016 from Resident to Jeff Kepley.

39. New Coastal Commission letters?

40. Text message from Charles Mowatt

41. Cell phone records of Alan Johnston

42. Emails from Sang Lee

Videos:

43. Defendant Sang Lee and other Bay Boys caught on video.

<https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video>

- 1 44. Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam
2 combat vet Mike Bernard and his son for surfing the public beach
3 telling them, among other things, "you won't come back here
4 again boy".
5 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>
- 6 45. Defendant Michael Papayans - blocking access to the public
7 beach: <https://vimeo.com/88394493>
- 8 46. MLK harassment - <https://vimeo.com/85025465>
- 9 47. Video of David Melo harassing Diana Milena Reed and Jordan
10 Wright and attempting to block their access to public beach
11 taken on 1/29/16.
- 12 48. Video of Hank Harper attempting to intimidate Diana Milena
13 Reed and her attorney while being interviewed by the media.
- 14 49. The Swell Life, (2001), interview of former Chief of Police Tim
15 Browne.
- 16 50. Video taken by Alan Haven on 10-10-16 of Sean Van Dine
17 punching Jason Buck on the cliff's edge that overlooks Lunada
18 Bay.
- 19 51. Camplin Memorial Video part 1 believed to be filmed by Mark
20 Griep.
- 21 52. Camplin Memorial Video part 2 believed to be filmed by Mark
22 Griep.
- 23 53. Camplin Memorial Video part 3 believed to be filmed by Mark
24 Griep.
- 25 54. Video of Cassidy B. and Devon Demaria harassing suffers at the
26 2017 MLK event.
- 27 55. Video taken by Chelsea Griep
- 28

1 **C. Damages**

2 A Computation of Damages Claimed by Plaintiff Under Fed. R. Civ. P.
3 26(a)(1)(A)(iii)

4 This case is primarily about broad, class-wide injunctive and
5 declaratory relief necessary to redress group-wide injury to visiting
6 beachgoers whom Defendants are denying access to Lunada Bay, whereby
7 a single injunction or declaratory judgment will provide relief to each member
8 of the class. In addition to equitable relief, on behalf of themselves and the
9 putative class, Plaintiffs Cory Spencer and Diana Milena Read seek uniform
10 and formulaic damages that are incidental to the requested equitable relief.
11 This includes damages under Civil Code section 52 and 52.1(b). Plaintiffs do
12 not have sufficient information at this time to provide an accurate estimate of
13 the incidental damages, however, such amount is to be determined at trial.

14 Plaintiffs also seek attorneys' fees, costs, and interest pursuant to Cal.
15 Civ. Code §§ 52.1 and 1021.5, 42 U.S.C. § 1983, and any other statute or
16 rule of law authorizing such an award.

17 At this early stage of discovery, however, Plaintiffs are unable to
18 provide a full computation of damages they will be seeking.

19 **D. Insurance**

20 Not applicable.

21 **E. Certification**

22 To the best of my knowledge, information, and belief, formed after an
23 inquiry that is reasonable under the circumstances, this disclosure is
24 complete and correct as of the time it is made.

1 DATED: March 2, 2017

HANSON BRIDGETT LLP

2
3 Bv: /s/ Kurt A. Franklin

4 KURT A. FRANKLIN
5 SAMANTHA D. WOLFF
6 CAROLINE ELIZABETH LEE
7 TYSON M. SHOWER
8 LONDON D. BAILEY
9 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
REED, and COASTAL PROTECTION
RANGERS, INC.

OTTEN LAW, PC

10 DATED: March 2, 2017

11
12 Bv: /s/ Victor Otten

13 VICTOR OTTEN
14 KAVITA TEKCHANDANI
15 Attorneys for Plaintiffs
16 CORY SPENCER, DIANA MILENA
17 REED, and COASTAL PROTECTION
18 RANGERS, INC.